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September 24, 2024

**VIA ECF**

Honorable Taryn A. Merkl  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Korey Watson v. The City of New York et al., 23-CV-08975 (LDH)(TAM)

Your Honor:

I am co-counsel for Plaintiff Korey Watson in the above-referenced matter. I write jointly with counsel for Defendants to respectfully request that Your Honor extend the deadline to complete Phase 1 discovery from September 30, 2024, until a date to be determined by the Court after the Court receives the parties' proposed Case Management Plan on October 7, 2024.

By way of procedural background, on April 17, 2024, the parties participated in the Initial Conference and the Court adopted a Scheduling Order. *See* Civil Docket Entry dated April 17, 2024. In pertinent part, that order set June 17, 2024 as the deadline to complete Phase 1 discovery and further scheduled a telephonic Pre-Settlement Status Conference for July 9, 2024, and an August 27, 2024 deadline for fact discovery. *Id.* On June 20, 2024, the Court granted a consent motion for an extension of time to complete Phase I discovery. *See* ECF 23; Civil Docket Entry dated June 20, 2024. At the July 9, 2024 telephonic conference, the Court extended the Phase I discovery deadline to August 30, 2024, set a follow-up telephonic conference for September 25, 2024, and directed the parties to file a Case Management Worksheet with the court no later than September 17, 2024. *See* ECF 24; Civil Docket Entry dated July 9, 2024. On August 22, 2024, the Court granted another consent motion to extend the time to complete Phase I discovery, to September 30, 2024. *See* ECF 27; Civil Docket Entry dated August 22, 2024. On September 20, 2024, the Court granted a consent motion to adjourn the September 25, 2024 status conference to October 15, 2024 at 9:30am, and adjourned the deadline to complete and file the Case Management Plan to October 7, 2024. *See* ECF 29; Civil Docket Entry dated September 20, 2024. However, the deadline to complete Phase I Discovery remains September 30, 2024.

On September 20, 2024, the parties met and conferred about the status of Phase I discovery. At that conference, counsel for the City Defendants stated that the City Defendants would provide certain documents on September 27, 2024, and the parties agreed to exchange written responses and objections to outstanding interrogatories and document demands the week of September 30, 2024. After that happens, the parties intend to meet and

confer again promptly to discuss any outstanding concerns about the status of Phase I discovery.

Therefore, the parties respectfully request that Your Honor extend the deadline to complete Phase 1 discovery from September 30, 2024 until a date to be determined by the Court after the Court receives the parties' proposed Case Management Plan on October 7, 2024.

Thank you for your attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver